

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Mahmoud Khalil et. al.,

*Plaintiff,*

v.

Columbia University and the Trustees of  
Columbia University, et. al.,

*Defendants.*

No. 1:25-cv-02079-AS

Hon. Judge Arun Subramanian

**PLAINTIFF’S STATUS REPORT ON PRE-HEARING MEET AND CONFER**

On March 20, 2025, this Court issued an order directing the parties to take (and not take) certain actions. Dkt. 20. In addition to establishing a briefing and hearing schedule, the Court directed the parties to “meet and confer in good faith to determine whether any part of the requested interim relief is unopposed.” *Id.* The parties did that Sunday—March 23, 2025. At that conference, Plaintiffs also raised a few procedural and logistical matters regarding Tuesday’s hearing. Plaintiffs hereby provide their report of that exchange.

To the extent that the other defendants are not opposed, the Columbia Defendants are not opposed to a stipulation providing the interim relief sought in Paragraph 1 of the Proposed Order if limited to the production to the Committee Defendants and the Agency Defendants of any records concerning Plaintiffs identified at Dkt. 15-1 at 6. The Committee Defendants and the Agency Defendants are opposed to any relief of any kind. The Columbia Defendants are not opposed to a stipulation providing interim relief resembling Paragraph 5 of the Proposed Order, if limited to the public disclosure of any personally identifying information that is confidential or private for Plaintiffs. The other defendants are opposed.

Plaintiffs’ counsel also proposed that the parties provide some indication to the Court as to their plans for presentation at today’s hearing. Subject of course to the Court’s permission, Plaintiffs provide those details here.

No party plans to offer witnesses. Plaintiffs, however, do intend to present evidence that postdates the emergency motion’s filing. To accommodate this, Plaintiffs’ counsel proposed that each party group be allotted a fifteen minute opening presentation prior to legal argument, or whatever would be of most benefit to the Court. For Plaintiffs’ own proposed opening and legal argument,’ Plaintiffs’ counsel seeks the Court’s permission to allow two attorneys—Amy Greer and Gadeir Abbas<sup>1</sup>—to present, with Ms. Greer handling the fifteen minute opening and Gadeir Abbas the legal argument. For Ms. Greer’s opening, Plaintiffs seek the Court’s permission to use the courtroom’s technology to project a Powerpoint that Plaintiffs believe will aid in the Court’s survey of the facts.

In addition to facilitating a division of responsibilities to permit full preparation in light of the expedited nature of these proceedings, and the volume of materials to be reviewed in advance, it is respectfully submitted that allowing Plaintiffs to proceed in this manner would “afford the opportunity for a junior attorney to gain experience” consistent with this Court’s guidance in *Individual Practices in Civil Cases*. *Individual Practices* at 7(A).

The Columbia Defendants take no position as to Plaintiffs’ proposal and defer to the Court’s determination as to how to structure today’s oral argument. The Congressional Defendants and Agency Defendants take no position on how Plaintiffs plan to present their argument and defer

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<sup>1</sup> Gadeir Abbas’ pro hac motion, filed on March 21, 2025, was rejected because it attached a Certificate of Good Standing from the Virginia State Bar, rather than from the Supreme Court of Virginia. His pro hac motion was refiled with the appropriate certificate on March 24, 2025, and is pending. *See* Dkt. 42. The document has been reviewed, and no deficiencies were found.

to how the Court prefers to order proceedings. Neither the Congressional Defendants nor the Agency Defendants ask to make a 15-minute opening presentation before legal argument.

Dated: March 25, 2025  
New York, NY

Respectfully submitted,

/s/ Amy E. Greer  
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